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STATE OF MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS LANSING

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Bureau of Fire Services Cannabis Division Field Inspection Processor Checklist

When an applicant applies for a cannabis license, one of the requirements is to obtain approval from the Bureau of Fire Services Cannabis Division. All facilities will need an on-site inspection, additionally, some facilities will be required to submit building plans for plan review and approval. The following Field Inspection checklist is designed to assist individuals that are working their way through the process of obtaining a Cannabis License from the State of Michigan.

Occupancy Types - Cannabis Facilities in Michigan

- ✓ Consumption Facilities Business/Assembly NFPA 1, 2021
- ✓ Grower Industrial NFPA 1, 2021
- ✓ Micro Business Multiple occupancy types based on use NFPA 1, 2021
- ✓ Processor Industrial or Special Use Industrial NFPA 1, 2021
- ✓ Provisioning Center Mercantile NFPA 1, 2021
- ✓ Safety Compliance Business NFPA 1, 20121
- ✓ Secured Transporter Business/Storage NFPA 1, 20121

Processor - General Information

□ Receive Approval from Plan Review Division –

- ✓ Submit a copy of your building plans to Bureau of Fire Services (BFS) Plan Review (directions on our website www.michigan.gov/bfs). Once the plans have been approved, plan review will attach a Plan Review Report to the ACCELA file when the review is completed.
- ✓ Ensure the report is provided to a facility representative who will be available during the inspection process.
- ✓ Phased projects require a new BFS application for each phase of the project.
- ✓ Phased plans shall indicate the existing conditions, proposed work area, and future work area.

□ Read and Comply with Plan Review Report –

- ✓ There are many items on the Plan Review Report which are valuable to your project. Carefully review each item to ensure compliance prior to scheduling your inspection.
- ✓ Special attention will be needed for any "**Bold**" comments on your review letter. Bold comments often indicate a deficiency on your review and will need to be corrected.
- ✓ A field inspector from the Bureau of Fire Services (BFS) will contact the facility representative to schedule your inspection when the project has been assigned.

☐ Local Inspections – Local Government or Other Authorities Having Jurisdiction (AHJ)

Verify that the following inspections have been completed and approved by local government (verification of approval will be required):

- ✓ Building Certificate of Occupancy
- ✓ Electrical inspection approval indication of approval for extraction processes and areas will be required.
 - a. C1D1 and/or C1D2 areas, generator, bounding and grounding
- ✓ Mechanical inspection approval indication of approval for extraction processes and areas will be required.
 - a. Extraction booth/room exhaust systems, post-oil processing areas exhaust systems, booth suppression
- ✓ Plumbing inspection approval
- ✓ Fire suppression system inspection and approval (if applicable) by Mechanical Inspector
- ✓ Fire alarm system inspection and approval (if applicable) by Electrical Inspector
- ✓ CO2 enrichment system inspection and approval (if applicable) by Mechanical Inspector

Processor - Specific Information

□ Ensure the following has been completed prior to scheduling your inspection:

- ✓ Plans Have been submitted and approved by Bureau of Fire Services (BFS), including any booths, hoods, and transfilling locations.
- ✓ **Transfilling -** May require State of Michigan Storage Tank Division approval, see plan review letter for details.
- Extraction Solvent Identify extraction solvent used in the extraction process (LPG, alcohol, CO2).
- ✓ Plan Review Report Provide report to facility representative who will verify compliance prior to inspection.
- ✓ Local Government Provide approvals from local AHJ as noted above.
- **Equipment Verification -** Provide specification sheets on all equipment being used within the processing area. This includes but not limited to booths, hoods, pumps, roto-vapes, extraction equipment, ovens.
- Extraction Equipment Provide a field engineer report for all extraction equipment.
- ✓ Post Oil Equipment- Processing operations including dispensing of flammable liquids between containers, shall be performed in one of the following locations:
 - (1) A chemical fume hood in accordance with Chapter 7 of NFPA 45
 - (2) An approved exhaust system installed in accordance with NFPA 91 or the mechanical code
- ✓ CO2 Extraction Equipment Pressure relief devices and blow-off valves shall be piped to the exterior of the building.
- ✓ **Training Provide** documentation that employees using the extraction equipment have been properly trained.
- Field Verification Provide documentation that the extraction equipment has been properly installed in accordance with the manufacturer recommendations.
- Emergency Back Up Power Emergency back-up power shall be installed to ensure the full operation of the booth if hydrocarbons are being used as the extraction medium (*NFPA 1, 2018 Chapter 38*).
- **Roto-Vapes -** If used in the post extraction process to remove flammable liquids or vapors, the roto-vape shall be located under a fume hood or in a processor room (*NFPA 1, 2018 Chapter 38*).
- Emergency Lighting Provide point-by-point photometrics calculations to inspector prior to final inspection.
- ✓ **Intumescent Thermal Barrier (fire retardant) –** If a fire retardant is applied within the facility, provide the testing documentation for the product, provide application affidavit from installer, provide manufacturer's instruction sheets.

*NOTE: Exposed spray-on foam requires an intumescent paint application in order to be in compliance. During recent inspections, BFS inspectors are discovering the spray-on foam and the required intumescent paint used to protect it, is deteriorating due to the room's environment. This deterioration will require constant reapplication of the intumescent thermal barrier by a contractor. This will result in additional expenses, along with business interruptions for reapplication of the product. Documentation, notification and affidavit are required for each reapplication.

- Fire Barriers and Separation Ensure all required fire barriers and separations are constructed as indicated on the approved plans and the plan review report. All through penetrations of required fire barriers to comply with NFPA 101:8.3.4.7.
- Common Path of Travel 50' ft. in non-sprinklered building and 100" ft. in sprinklered building.
- ✓ Signage Provide CO2 and NFPA 704 signage as required.
- Detection Devices Detection devices may be required depending on the extraction medium. Consult with your design professional.

- Fire Suppression For hydrocarbon extraction (LPG), the C1D1 booth shall be equipped with a fire suppression system, including suppression of the duct work. (NFPA 1, 2018 chapter 38).
- Vehicle Impact Protection Guard posts or other secured means shall be provided to protect compressed gas cylinders, containers, tanks and systems indoors and outdoors from vehicular or fall damage.
- Safety Data Sheets (SDS) All applicable safety data sheets (SDS) shall be posted in the extraction area near an exit.
- ✓ Compressed Cylinders Shall be secured from tipping and shall not be stored in the extraction room area.
- Extension Cords All extension cords shall be removed and shall not be used in lieu of permanent wiring.
- Fire Doors Required fire doors shall properly close and latch. Fire doors are not permitted to be wedged or propped open.
- Fire Extinguishers Shall be unobstructed and mounted to a secured surface no higher than 5' ft. from floor.

 All fire extinguishers are required to be serviced annually.
- ✓ **Emergency Lighting and Exit Lights -** Shall be properly lit and properly operate on back-up power. Identifying the exit and emergency lighting circuits will assist in the testing of the lights during your inspection.
- ✓ **Security Gates -** Security gates, grills, or rolling doors shall not be permitted on any exit doors.
- ✓ Relocatable Power Taps All portable relocatable power taps (commonly known as surge bars) shall be listed to UL-1363 or UL-1363A.
- ✓ Flammable and Combustible Liquids Shall be stored in an approved flammable liquid storage cabinet.
- ✓ Exit Obstruction Exits and exit access shall not be visually obstructed and shall be clearly identified.
- ✓ Mantrap Doors Shall fail safe in the un-locked position upon loss of power.
- ✓ **Electrical -** All electrical shall be properly listed and installed in accordance to the applicable code.
- ✓ **LPG Extraction Equipment** All conductive equipment and conductive objects within the exhaust room shall be bonded and grounded with a resistance of less than 1.0 x 106 ohms.
- ✓ **Liquid Storage Tanks and Containers -** All liquid storage tanks and containers shall be labeled as to their contents.
- ✓ Refrigerators, Freezers, Cooling Equipment equipment used to store or cool flammable liquids shall be listed for the storage of flammable / combustible liquids or be listed for Class 1, Division 1 locations, as described in Article 501 of NFPA 70.

The above items are common issues found during inspection. This list is not all encompassing and should only be used as a general guide to assist the facility in preparing for an inspection from the Bureau of Fire Services (BFS).

For more information on BFS requirements for cannabis facilities go to www.michigan.gov/bfs See "Cannabis Plan Reviews/Inspections"